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February 18, 2025

**Via CM/ECF**

The Honorable Jessica S. Allen  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07102

Re: *Jones v. Kleinman*, No. 2:24-cv-10750-BRM-JSA (D.N.J.)

Dear Judge Allen,

We represent Plaintiff Amanda Jones in the above-referenced matter. Pursuant to Rule 26(f), we conferred with counsel for Defendant Dan Kleinman regarding pending deadlines and discovery.

If the Court agrees, in light of District Judge Martinotti's order [16] denying Defendant's request for a premotion conference and holding in abeyance Defendant's deadline to answer or to move to dismiss until after Your Honor decides the Motion to Stay [11], the Parties have agreed to defer the initial disclosures required by Rule 26(a)(1), as well as the proposed discovery plan, until that motion is resolved. The Parties also request that the Rule 16 conference be rescheduled following the resolution of the Motion to Stay.\*

Further, pursuant to Your Honor's letter order [9], we hereby notify the Court that Plaintiff's Motion to Stay [11] is under submission as of today's date.

Defendant additionally notifies the Court that he has filed a Motion for First-Filed Injunction [10], which has been opposed by Plaintiff [21]. Defendant will be filing his reply brief on or before February 24, 2025, and the Motion will be under submission on March 3, 2025. Defendant requests that the Court consider the Motion to Stay and the Motion for First-filed Injunction simultaneously. Plaintiff opposes that request.

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If the Court requires any additional information from the Parties, please let us know. Thank you in advance for your consideration.

Sincerely,

*Kaja S. Elmer*

Kaja S. Elmer  
*Attorney for Amanda Jones*

cc: Counsel of record via CM/ECF  
Alysson Mills

\*Request Granted. The Initial Rule 16 Conference scheduled for 3/3/25 is hereby adjourned.

SO ORDERED.

s/Jessica S. Allen  
United States Magistrate Judge

Dated: February 24, 2025